

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KYLE GRANT, individually and on behalf of  
other persons similarly situated who were  
employed by WARNER MUSIC GROUP  
CORP. and ATLANTIC RECORDING  
CORPORATION,

Plaintiff,

Case No. 13-cv-4449 (PGG)

-against-

WARNER MUSIC GROUP CORP. and  
ATLANTIC RECORDING CORPORATION,

Defendants.

**DECLARATION OF LAURA SACK**

**I, LAURA SACK, STATE AS FOLLOWS:**

1. I am a shareholder in the firm of Vedder Price P.C., attorneys for defendants Warner Music Group Corp. and Atlantic Recording Corporation. I am familiar with all the facts and circumstances set forth in this Declaration. I make this Declaration in order to introduce certain documents referenced in the accompanying Memorandum of Law.

2. Attached as Exhibit A hereto is the Declaration of Monica Barrios.

3. Attached as Exhibit B hereto is the Declaration of Carolyn Clark.

4. Attached as Exhibit C hereto is the Declaration of Ioannis Fagkridas, with Exhibits A-D attached thereto.

5. Attached as Exhibit D hereto is the Declaration of Edward Larsen.

6. Attached as Exhibit E hereto is the Declaration of Brian Murray, Jr.

7. Attached as Exhibit F hereto is the Declaration of Michelle Ozog.

8. Attached as Exhibit G hereto is the Declaration of Andrew Spalter.

9. Attached as Exhibit H hereto is the Declaration of Manuel Sandoval, which was filed in support of the plaintiffs' motion for court-authorized notice pursuant to Section 216(b) of the Fair Labor Standards Act ("FLSA") in the action captioned *Sandoval v. Galaxy General Contracting Corp.*, No. 10 Civ. 5771.

10. Attached as Exhibit I hereto are the first three pages of a 126-page set of business records filed on February 15, 2013 in support of the plaintiffs' motion for, *inter alia*, court-authorized notice pursuant to Section 216(b) of the FLSA in the action filed in the Southern District of New York captioned *Glatt v. Fox Searchlight Pictures Inc.*, No. 11 Civ. 6784.

11. Among the internship postings described in Exhibit I is a posting for an internship position which states: "Projects/Tasks: Process paperwork for feature film casting so that talent gets paid - Provide research support for Script Clearance using various databases - Proof reading and management of titles and credits documents to assure compliance are met - Track contracts to assure all necessary obligations are met - Review marketing and press materials for accuracy and to ensure contractual obligations are met...."

12. Also among the internship postings described in Exhibit I is a posting for another internship position which states: "Interns will assist in designing elements that include but are not limited to web page content and print material for various markets and events. They will research design trends and provide assistance in conceptualizing various projects as specialty packaging, posters, and online flash pieces."

13. Also among the internship postings described in Exhibit I is a posting for another internship position which states: "Projects Intern will be working on: - Script/coverage reading -

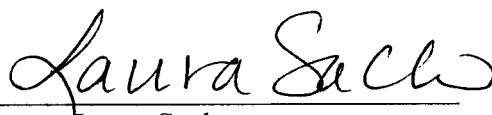
Organize project-related production materials - Track new talent, film festivals, directors, writers, actors and comedians - Assisting with various organizational projects.”

14. Attached as Exhibit J hereto are examples of internship postings filed on June 7, 2012 in support of the plaintiffs’ motion for, *inter alia*, court-authorized notice pursuant to Section 216(b) of the FLSA in the action filed in the Southern District of New York captioned *Wang v. Hearst*, No. 12 Civ. 793.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
February 7, 2014

  
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Laura Sack